

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Renaissance Marketing Corporation, an Illinois corporation, and Julia Meyer, an individual,)	
)	
Plaintiffs,)	
)	Case No. 06 C 5874
v.)	
)	Judge Blanche M. Manning
Real Chicago Publishing, LLC, an Illinois company, and Trent Modglin, an individual,)	
)	Magistrate Judge Nan R. Nolan
Defendants.)	

**AGREED MOTION FOR ENLARGEMENT OF TIME FOR PLAINTIFFS TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS AND ENLARGEMENT OF
TIME FOR DEFENDANTS TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS**

Plaintiffs Renaissance Marketing, Inc. and Julia Meyer (collectively "plaintiffs"), by their attorneys, Crowley Barrett & Karaba, Ltd., and pursuant to Fed. R. Civ. P. 6(b), respectfully move this Court for an enlargement of time until April 13, 2007, to respond to defendants' motion to dismiss the *Complaint* and for an enlargement of time until May 4, 2007, for defendants to file a reply brief in support of their motion to dismiss. In support of its motion, plaintiffs state as follows:

1. On February 2, 2007, defendants filed a motion to dismiss the *Complaint* pursuant to Fed. R. Civ. P. 12(b).
2. On February 7, 2007, this Court set a deadline of March 8, 2007, for plaintiffs to respond to the motion to dismiss and a deadline of March 29, 2007, for defendants to file a reply brief in support of their motion to dismiss.
3. The parties have been engaged in settlement discussions.

4. If plaintiffs were to prepare a response to the motion to dismiss prior to the conclusion of the settlement process, it would waste their resources. Because it would also materially increase plaintiffs' attorney's fees, it would force them to increase their settlement demand, which would decrease the chances of settlement. Similarly, an extension will allow the defendants to avoid the expense involved in replying to plaintiffs' response prior to the conclusion of the settlement process.

5. On February 28, 2007, counsel for plaintiffs, Karl Leinberger, and counsel for defendants, Michael McGee, spoke via telephone. During that conversation, Mr. McGee indicated that defendants do not have any objection to plaintiffs' request for additional time to respond to the motion to dismiss in order to allow the settlement process to be completed first.

6. Additionally, the aforementioned counsel have communicated with counsel for defendants in a parallel case in an effort to reach a global settlement that would resolve the disputes in both cases. Currently, mediation in the parallel case is scheduled to occur on March 21, 2007, before Judge Morton Denlow. Extending the deadline for plaintiffs to respond to the motion to dismiss will allow that mediation to take place (and to possibly involve the above-captioned defendants) without any of the parties expending resources on briefing for the motion to dismiss.

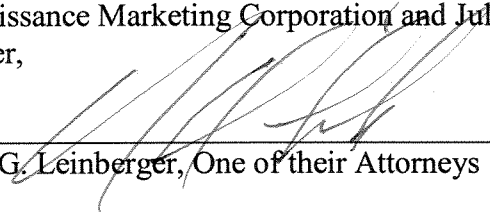
7. This Court scheduled a status hearing for March 13, 2007, at 11 a.m. for this case. If the Court grants the instant motion, plaintiffs respectfully request that this Court reschedule the status hearing until sometime after the March 21 mediation before Judge Denlow.

WHEREFORE, for the foregoing reasons, plaintiffs respectfully request that this Court enlarge the time for them to respond to the motion to dismiss until April 13, 2007, and for an

enlargement of time until May 4, 2007, for defendants to file a reply brief in support of their motion to dismiss.

Respectfully submitted,
Renaissance Marketing Corporation and Julia
Meyer,

By:


Karl G. Leinberger, One of their Attorneys

Dated: March 2, 2007

Mr. Karl G. Leinberger (Atty. I.D. No. 6237537)
Crowley Barrett & Karaba, Ltd
20 South Clark Street
Suite 2310
Chicago, Illinois 60603
312.726.2468